

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No.: 1:23-cv-20727-RKA

RYAN BRESLOW, et al.,

Plaintiffs,

v.

MARK PHILLIPS, et al.,

Defendants.

DECLARATION OF SAMEER TARIQ

I, Sameer Tariq, declare as follows:

1. I am over the age of eighteen and am competent to testify as to the matters herein.

The following is based on personal knowledge unless otherwise noted.

2. In December 2021, Mark Phillips (“Phillips”) recruited me to work for the unincorporated nonprofit association known as Movement DAO (“Movement”). I discussed Movement with Phillips and Alex Fine, who communicated with me under the name Steve Faffle. Phillips explained that Movement was a new decentralized autonomous organization (“DAO”) that would provide for the funding of social movements through blockchain technology and the formation of other DAOs.

3. I began working as a developer at Movement in December 2021, where I help develop Movement’s architecture.

4. I am paid at an hourly rate of \$60.00, and I work approximately forty hours per

week for Movement.

5. As part of my compensation for my development work, Phillips and Benjamin Reed (“Reed”) have transferred funds into the Movement Gnosis on my behalf such that I have governance tokens in Movement.

6. I understood that Phillips and Reed formed an emergency committee in January 2023 (the “Committee”) as a way for Movement stakeholders, including internal developers, large contributors, small contributors, and independent members of the community, to help guide Movement’s governance following efforts by Ryan Breslow, Alex Fine, and Jon Gordon, to take their money out of Movement in defiance of Movement’s governing documents, including its GitBook and Guiding Principles.

7. As a contributor to and member of Movement, I believe that any transfer of funds on the part of Phillips and Reed were done in accordance with authority Movement’s members provided them through various MIPs and for the proper purpose of funding Movement’s continued operations and development.

8. I continue to this day to perform development work for Movement, which I believe is necessary for Movement’s continued operations and development.

I, Sameer Tariq, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Dated: Sialkot, Pakistan, March 17, 2023

DocuSigned by:
Sameer Tariq
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Sameer Tariq